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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYLON THIJAY RANDLE,

Defendant.

CASE NO. 1:21-CR-00246-DAD-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: February 23, 2022

TIME: 1:00 p.m.

COURT: Hon. Magistrate Judge Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on February 23, 2022.

2. By this stipulation, the parties move to continue the status conference until April 13, 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between February 23, 2022, and April 13, 2022.

3. The parties agree and stipulate, and request that the Court find the following:

a) Initial discovery was provided to defendant on or about October 18, 2021, consisting of 114 Bates-stamped items including reports of investigation, body worn camera recordings, photographs, certified conviction records and a summary of defendant's criminal

1 history.

2 b) Counsel for defendant desires additional time to review discovery, consult with
3 her client, conduct investigation and research related to the charges, and to otherwise prepare for
4 trial.

5 c) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny her the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 d) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of February 23, 2022 to April 13,
13 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it
14 results from a continuance granted by the Court request on the basis of the Court's finding that
15 the ends of justice served by taking such action outweigh the best interest of the public and the
16 defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 15, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ CHRISTOPHER D. BAKER
CHRISTOPHER D. BAKER
Assistant United States Attorney

Dated: February 15, 2022

/s/ CHRISTINA CORCORAN
CHRISTINA CORCORAN
Counsel for Defendant
RAYLON THIJAY RANDLE

ORDER

IT IS SO ORDERED that the status conference is continued from February 23, 2022, to **April 13, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **February 16, 2022**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE